21 Griffin Road North
Windsor, CT 06095

860.298.9692 PHONE
860.298.6399 FAX

www.TRCsolutions.com

April 30, 2012

Ms. Katherine Woodward, PE
Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, MA 02109-3912
Via Mail

Re: Self-Implementing Cleanup Plan for International Baccalaureate School East Building and Connectors – Modification Revision #1
85 Edwards Street, Hartford, CT

Dear Ms. Woodward:

Due to an unexpected and previously inaccessible/concealed change in site conditions, TRC is submitting a modification to the Self-Implementing Cleanup Plan (SIP) developed to address PCB-containing building materials at International Baccalaureate School East Building and Connectors for review by EPA. Implementation of this plan modification will allow for the safe removal and proper disposal of PCB-containing materials prior to demolition/renovation activities at the site. Work will not commence in the affected areas without having received approval from EPA.

Previously it was determined that exterior door caulk (46,000 mg/kg PCB) was present along the metal door frames, exterior expansion joint caulk (100,000 mg/kg PCB) was present along the horizontal length of the mechanical room intake vents and exterior window caulk (<50 mg/kg PCB) was present around the exterior metal window frames. Upon initial inspection it was believed that a simple horizontal metal lintel was above the door, vent and window frames, and the caulk in these upper horizontal locations was therefore only in contact with the metal door/vent/window frame and the simple lintel. The previously approved remedial plan was to remove the caulk and associated metal door frames, intake vents, window frames and simple lintel in their entirety and dispose of them as PCB waste. However, during renovation activities it has recently been discovered that the exterior door caulk, expansion joint caulk associated with the intake vents and the exterior window caulk are actually in contact with a horizontal painted hung lintel /structural I-beam located above the doors, intake vents and windows which was previously inaccessible and concealed by the brick facade. As the hung lintel/structural I-beam runs the entire length of the wall and is a structural building component, the hung lintel will not be removed for disposal, as was the plan for a simple lintel only above the frames.

Due to the identification of the previously concealed condition of the caulks in contact with a porous surface (paint) on a metal structural component to remain, the following remedial actions will be implemented to remove the bulk product waste caulk and presumed remediation waste paint. The caulk/frames will be removed along with the paint from the entire face of the exposed portions of the hung lintel which contacts the caulk. Paint on the other vertical/horizontal surfaces of the structural I-beam/lintel not in direct contact with the caulk will remain as will the paint on the remaining concealed portions of the structural I-beam/lintel behind the brick façade. Once the door frames, intake vents, window frames and their associated caulk have been removed multiple removal methods will be utilized to remove the paint from the face of the hung lintel. Multiple removal methods are being proposed in the event that one method may prove more effective than another. Paint removal methods may include:

1. Hand Scraping: The contractor will use hand tools to manually scrape the paint off the metal surface.
2. Grinding: The contractor will use a shrouded mechanical grinder connected to vacuum unit with HEPA filter that empties directly into the waste container to remove the paint from the metal surface.
3. Needle Gun: The contractor will use a shrouded mechanical needle gun connected to vacuum unit with HEPA filter that empties directly into the waste container to remove the paint from the metal surface.
4. Chemical Stripping: The contractor will use Peel Away ST1 and Peel Away Smart Strip Pro in accordance with manufacturer's instructions to remove the paint from the metal surface. (MSDS sheets are attached)

All remedial activities will be conducted utilizing the previously approved engineering controls.

After completion of paint removal from the face of the lintel, the project monitor will then conduct a visual inspection to determine the work area has been cleaned of all dust generated during the abatement and the face of the metal lintel has reached Visual Standard No. 2, Near-White Blast Cleaned Surface Finish, of the National Association of Corrosion Engineers (NACE 2/SSPC-SP10) for unrestricted use, in accordance with 40 CFR 761.79. If the NACE 2 standard cannot be met, verification wipe samples will be taken from the face of the lintel. All wipe samples will be required to be $<10\mu g/100cm^2$ as the structural beam will be enclosed within the wall cavity prior to building reoccupancy.

If you have any questions you may contact Jennifer Peshka, TRC, at 860-298-9692 or via email at jpeshka@trcsolutions.com.

Sincerely

Jennifer Peshka
Project Manager

CC: Gary Trombly, CTDEP
James W. Foote, PE, ARCADIS/O&G